

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Liquidation of Bernard L. Madoff Investment  
Securities LLC,

v.

FREDERIC Z. KONIGSBERG, SUSAN M.  
KONIGSBERG, BRADERMAK, LTD.,  
BRADERMAK EQUITIES CORP., LEE  
RAUTENBERG, JAN STAHL, GERI STAHL,  
H. PETER STEIL, APO HEALTH, INC. PSP  
F/B/O H. PETER STEIL, APO HEALTH, INC.  
PSP F/B/O JAN STAHL, BUYER'S  
ALTERNATIVES, INC. PSP F/B/O JAN  
STAHL, and PJS TRADING, INC. PSP F/B/O  
JAN STAHL

Defendants.

Adv. Pro. No. 10-04394 (CGM)

**STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION**

This Stipulation Extending Time to Conclude Mediation ("Stipulation") is submitted pursuant to the Bankruptcy Court's Order entered November 10, 2010 (1) Establishing Litigation

Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (“Case Management Procedures Order”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including November 15, 2021.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

**[THIS PORTION IS INTENTIONALLY LEFT BLANK]**

Dated: August 12, 2021  
New York, New York

**BAKER & HOSTETLER LLP**

By: /s/ Robertson D. Beckerlegge  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: 212.589.4200  
Facsimile: 212.589.4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Nicholas J. Cremona  
Email: ncremona@bakerlaw.com  
Robertson D. Beckerlegge  
Email: rbeckerlegge@bakerlaw.com  
Robyn M. Feldstein  
Email: rfeldstein@bakerlaw.com

*Attorneys for Plaintiff Irving H. Picard, Trustee for  
the Liquidation of Bernard L. Madoff Investment  
Securities LLC and the Chapter 7 Estate of Bernard  
L. Madoff*

**BERNFELD, DEMATTEO & BERNFELD LLP**

By: /s/ David Bernfeld  
600 Third Avenue  
New York, New York 10016  
Telephone: 212.661.1661  
Facsimile: 212.557.9610  
David B. Bernfeld  
Email: davidbernfeld@bernfeld-dematteo.com  
Jeffrey L. Bernfeld  
Email: jeffreybernfeld@bernfeld-dematteo.com

*Attorneys for Defendants Frederic Z. Konigsberg,  
Susan M. Konigsberg, Bradermak, Ltd., Bradermak  
Equities Corp., Lee Rautenberg*

**STRADLEY RONON STEVENS &  
YOUNG, LLP**

/s/ Deborah A. Reperowitz  
Stradley Ronon Stevens & Young, LLP  
100 Park Avenue, Suite 2000  
New York, New York 10017

Telephone: 212.812.4138  
Fax: 646.682.7180  
dreperowitz@stradley.com

*Mediator*